

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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 Attorneys For Debtors/Debtors-in-Possession

PANTALEO LAFORGIA and
 ANNA MARIA LAFORGIA,
 Debtors.

Case No.: 17-22853Chapter: 11

Hearing Date: March 7, 2019

Judge: Kathryn C. Ferguson

ADJOURNMENT REQUEST

1. I, Timothy P. Neumann, Esq.,
☒ am the attorney for: Pantaleo Laforgia and Anna Maria Laforgia,
☐ am self represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: ConfirmationCurrent hearing date and time: 3/7/2019 at 2 p.m.New date requested: ~~4/10/2019 at 2 p.m.~~

Reason for adjournment request: The Debtors filed a motion to reclassify the IRS claim and the IRS filed an amended proof of claim in response. The amended proof of claim substantially increased the priority claim and impacts feasibility. The tax years in question are 2007 and 2008 and I contacted IRS counsel and inquired as to how the tax liability for these years could be priority. Counsel requested that I seek contact the IRS before filing another motion. I called George Hellerman, who signed the proof of claim, and left a voicemail for him. I hope to resolve this consensually but if not I intend to file another motion to further reclassify the IRS claim.

2. Consent to adjournment:

I have the consent of all parties. ☒ I do not have the consent of all parties (explain below):

I have consent from every party I have Document. Consented to the IRS and one other secured creditor have consented.

I certify under penalty of perjury that the foregoing is true.

Date: 3/4/2019

/s/Timothy P. Neumann, Esq.
Signature

Note: Mr. Neumann obtained consent from all objecting parties after this form was submitted to the court. (dmm 3/5/19)

COURT USE ONLY:

The request for adjournment is:

☒ Granted

New hearing date: 4/18/19 at 2:00 p.m.

☒ Peremptory

☐ Granted over objection(s) New hearing date: _____

☐ Peremptory

☐ Denied

new.8/1/15